

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

ANNUAL COMPLIANCE REVIEW, 2016

Docket No. ACR2016

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
QUESTIONS 1-5 AND 7 OF CHAIRMAN'S INFORMATION REQUEST NO. 27

The United States Postal Service hereby provides its responses to the above-listed questions of Chairman's Information Request No. 27, issued on March 9, 2017. Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

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1. The Postal Service states that for the Delivery (Residential) and Delivery (Small/Medium Business) customer surveys, "[r]esidential [customers] and Small/Medium businesses are sampled sufficiently to ensure, at the District level, a minimum precision level of +/- 5 percentage points, at the 90 percent level of confidence per postal quarter."¹ In a Chairman's Information Request (CHIR) response, the Postal Service specified that 270 survey responses are necessary to achieve this level of precision per quarter.² However, in FY 2016, the Postal Service received 35,675 completed Delivery (Residential) surveys and 35,484 completed Delivery (Small/Medium Business) surveys. FY 2016 *Annual Report* at 18. Thus, a large number of Districts did not meet this level of precision per quarter for both Residential and Small/Medium Business customers.³
 - a. Please identify the Districts by quarter that did not receive at least 270 completed Delivery (Residential) surveys.
 - b. Please identify the Districts by quarter that did not receive at least 270 completed Delivery (Small/Medium Business) surveys.
 - c. Please specify the minimum number of Area-level completed Delivery (Residential) and Delivery (Small/Medium Business) surveys necessary per quarter for National-level estimates to meet the required precision and confidence level.
 - i. Please describe how the quarterly Area-level Delivery survey responses are weighted and aggregated to represent an annual, National-level estimate.
 - ii. Please specify the level of precision at the Area and National levels.

RESPONSE:

- a. The confidence level specified above is applicable to Small/Medium Business (SMB) and Residential customer surveys as a whole. The Postal Service does not attempt to

¹ United States Postal Service FY 2016 Annual Compliance Report, December 29, 2016, at 72.

² Docket No. ACR2015, Responses of the United States Postal Service to Questions 1-12, 16-18 of Chairman's Information Request No. 13, February 18, 2016, question 1.

³ The Postal Service states there are 67 Districts. Docket No. PI2015-1, Library Reference USPS-LR-PI2015-1/7, February 17, 2017, file "PI2015-1 Internal SPM Audit Plan v1.0.pdf," at 6. Consequently, the Postal Service would need to receive at least 18,000 completed surveys per quarter (or over 72,000 survey responses per year) for both the Delivery (Residential) and Delivery (Small/Medium Business) surveys to achieve the stated level of precision assuming an even distribution of surveys across Districts and quarters.

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attain this confidence level for each of the segments independently. In addition, the goal of the Postal Service is to attain a statistically valid number of responses on an annual basis, which translates to a minimum of 270 responses by the end of the fiscal year. Internally, the Postal Service has set a goal of attaining that level of confidence for each quarter. To address the question posed specifically, no district attained 270 Delivery (Residential) survey responses for any quarter.

b. The confidence level specified above is applicable to SMB and Residential customer surveys as a whole. The Postal Service does not attempt to attain this confidence level for each of the segments independently. In addition, the goal of the Postal Service is to attain a statistically valid number of responses on an annual basis, which translates to a minimum of 270 responses by the end of the fiscal year. Internally, the Postal Service has set a goal of attaining that level of confidence for each quarter. To address the question posed specifically, no district attained 270 Delivery (SMB) survey responses for any quarter.

c.i. No weighting is performed in the aggregation of response counts. The number of responses required to meet the established confidence level is 270. The 270 figure is the aggregate response count from both the Residential and SMB segments combined.

c.ii. The level of precision is the same for each level that is being addressed: 90 percent +/- 5 percent.

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2. In the FY 2015 Annual Performance Report and *FY 2016 Report*, the Postal Service stated that it will “continue to work to improve response rates to [its] surveys.”⁴ In a CHIR response, the Postal Service provided some response rate related information for the Point of Sale (POS) Survey.⁵ The following questions relate to the Postal Service's efforts to improve response rates for each of the other customer surveys: Delivery (Residential), Delivery (Small/Medium Business), Business Service Network, Customer Care Center, and Large Business. For each of these customer surveys, please provide the following information.
- a. Please describe the Postal Service's efforts to improve survey response rates in FY 2015 and FY 2016.
 - b. Please identify the steps taken or planned to improve response rates in FY 2017.
 - c. Please provide a summary of any non-response analyses or findings.
 - i. If no non-response analyses were conducted, please explain why.
 - ii. If non-response analyses are planned, please specify when they will be completed.
 - d. The Postal Service states that for the POS survey, it is “[i]ncreasing the response rate to include a wider range of national perception across the retail network[.]” *Id.* Please clarify what is meant by a “wider range of national perception across the retail network.”

RESPONSE:

- a. The Postal Service is continuously working with its frontline associates (retail counter clerks) to invite customers to participate in the POS survey. Currently, each associate circles the bottom of the POS receipt and verbally invites the customer to participate. This effort has increased the number of responses each year and is expected to continue. The Delivery survey is maintaining the level of responses required to meet the

⁴ Docket No. ACR2015, United States Postal Service FY 2015 Annual Report to Congress, Library Reference USPS-FY15-17, December 29, 2015, at 17; FY 2016 *Annual Report* at 19.

⁵ Response of the United States Postal Service to Question 6 of Chairman's Information Request No. 15, March 7, 2017, question 6.

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level of statistical validity at the annual level; however, the Postal Service has conducted pilots using alternate media methods to identify opportunities to increase the number of responses beyond the minimum amount required. Business Service Network (BSN) representatives also promote the opportunity for their customers to participate in the survey when they interact with a customer who has opened a service request. The Large Business survey is panel-based and receives the required number of completed surveys.

The Customer Care Center survey is offered to all customers who call in. There was an increase in CCC survey response rates from 8.7 percent in FY 2015 to 30.1 percent in FY 2016. This increase was the result of a change in methodology: instead of offering the survey from a manual call-back, the Postal Service made a real-time offer, leveraging new technology.

b. As previously described, the promotion of the POS and BSN surveys to customers is an ongoing effort and will continue through FY 2017. The delivery pilots performed in FY 2016 indicated that a possible change in the invitation media being sent to potential survey participants may assist in increasing the overall number of responses. The Postal Service is currently evaluating the above. Current CCC survey response rates are comparable to other industries, and the Postal Service is on track to meet the same response rate or higher in FY 2017.

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c.i. The Postal Service has not performed non-response analyses, since the required level of survey responses is being met. For the CCC survey, the Postal Service has determined that a non-response analysis would not be useful, as the sample is not limited in any way – all are given the opportunity to provide feedback.

c.ii. Non-response analyses are not currently planned.

d. To increase the range of national perception, the Postal Service reviewed the POS Survey response rates and identified ZIP Codes with minimal response rates. Personnel followed up with those sites to ensure that clerks were circling the receipt and inviting customers to go online and take the POS Survey. As a result, there has been a decline in the number of sites with zero responses, thereby allowing the Postal Service to obtain a wider range of customer perceptions from many more ZIP Codes.

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3. In a CHIR response, the Postal Service states, "The greatest increase in motor vehicle accidents [in FY 2016] involved third parties striking Postal Service vehicles while in the performance of delivery. There was a sharp increase in stationary vehicles being struck from behind or being struck while the other vehicle was attempting to pass."⁶ The following questions relate to these statements and the motor vehicle accidents (MVA) by cause file the Postal Service included with its response.⁷
- a. Each accident type has a three-digit code before it.⁸ Please explain what each three-digit code means. In the response, please describe the role played by the Postal Service vehicle (e.g., whether a Postal Service vehicle struck a third party or was struck by a third party).
 - b. Please provide a key or data dictionary that describes the differences among the cause codes used in the MVA File and the codes used in the other Excel files submitted with the March 1, 2017 Response to CHIR No. 19.⁹
 - c. Please specify which accidents listed in the MVA File resulted in an Occupational Safety and Health Administration (OSHA) recordable or non-recordable injury or illness.

RESPONSE:

- a. The following is a list of all motor vehicle (MV) cause codes used in the Employee Health and Safety (EHS) accident reporting system.

400	MV-ROLLAWAY - ENGINE OFF
401	MV-RUNAWAY - ENGINE ON
500	MV-COLLSN/SIDESWIP VEHS IN MOTION
501	STRUCK BY VEHICLE
502	COLLISION OR SIDESWIPE ON AN INTERSECTING ROAD
503	COLLISION OR SIDESWIPE WHILE PASSING OR BEING PASSED
504	COLLISION OR SIDESWIPE WITH A VEHICLE AHEAD, SAME DIR AND ROAD

⁶ Responses of the United States Postal Service to Questions 7-11 of Chairman's Information Request No. 19, March 1, 2017, question 7.c (March 1, 2017 Response to CHIR No. 19).

⁷ See *id.* questions 7.a and 7.b, Excel file "ChIR.19.Q.7.MVA by Cause.xlsx" (MVA File).

⁸ For example, column A, row 2 states "500-MV-COLLSN/SIDESWIP VEHS IN MOTION."

⁹ See March 1, 2017 Response to CHIR No. 19, Excel files "ChIR.19.Q.9.NonRecordable.Cause.xlsx" and "ChIR.19.Q.10.OSHA by Cause.xlsx."

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505	COLLISION OR SIDESWIPE WITH A VEHICLE BEHIND, SAME DIR AND ROAD
600	MV-COLLSN/SIDESWIP STAT VEH/OBJ
601	COLLISION OR SIDESWIPE WITH A VEHICLE OR OBJECT ON SIDE OF ROAD
602	STANDING IN ROAD AND STRUCK BY A VEHICLE
603	STANDING OFF ROAD AND STRUCK BY A VEHICLE
700	MV-NON-COLLISION ACCIDENTS
701	RAN OFF ROADWAY OUT OF CONTROL
702	SUDDEN STOP OR START
703	OTHER NON-COLLISION ACCIDENT
800	THIRD PARTY CAUSED INCIDENT

Code 800 reflects instances where third parties have struck Postal Service vehicles while either parked or while delivering mail. The Postal Service vehicle and driver were not at fault and did not contribute to the accident.

b. The table provided in the response to Question 3.a., above, indicates the narrative differences between each cause code available for motor vehicle accidents.

c. The following table shows the total number of motor vehicle accidents (MVAs) in FY 2015 and FY 2016, with an additional column indicating the count of those MVAs that are considered recordable by OSHA. These counts reflect either medical treatment, days away from work, or restricted duty.

Cause	Total MVA FY-15	Recordable FY-15	Total MVA FY 16	Recordable FY-16
500-MV-COLLSN/SIDESWIP VEHS IN MOTION	14,251	1468	14,853	1576
600-MV-COLLSN/SIDESWIP STAT VEH/OBJ	10,662	425	11,678	388
700-MV-NON-COLLISION ACCIDENTS	837	2	851	95
501-STRUCK BY VEHICLE	142	227	361	79
602-STANDING IN ROAD AND STRUCK BY A VEHICLE	183	2	254	0
400-MV-ROLLAWAY - ENGINE	123	7	163	1

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OFF				
401-MV-RUNAWAY - ENGINE ON	141	20	149	27
800-THIRD PARTY CAUSED INCIDENT	1,609	1313	1,769	1625
703-OTHER NON-COLLISION ACCIDENT	99	20	114	11
170-LEGALLY PARKED ON ROADWAY	73	0	99	0
152-STRUCK BY MATERIAL OR EQPT.	45	0	78	0
171-LEGALLY PARKED OFF ROADWAY	35	0	59	0
505-COLLISION OR SIDESWIPE WITH A VEHICLE BEHIND, SAME DIR AND ROAD	9	10	33	4
503-COLLISION OR SIDESWIPE WHILE PASSING OR BEING PASSED	2	1	21	0
151-STRUCK BY FLYING OBJECTS	13	0	18	0
150-STRUCK BY FALLING OBJECTS	14	0	17	0
601-COLLISION OR SIDESWIPE WITH A VEHICLE OR OBJECT ON SIDE OF ROAD	1	0	16	0
369-FIRE-UNDETERMINED CAUSE	8	0	9	0
504-COLLISION OR SIDESWIPE WITH A VEHICLE AHEAD, SAME DIR AND ROAD	2	0	8	4
502-COLLISION OR SIDESWIPE ON AN INTERSECTING ROAD	1	1	4	0
701-RAN OFF ROADWAY OUT OF CONTROL	0	0	4	0
603-STANDING OFF ROAD AND STRUCK BY A VEHICLE	0	0	3	0
172-RC, OFF-DUTY VEHICLE-RELATED	2	0	1	0

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4. The following question relates to Postal Service's Employee and Labor Relations Manual, Issue 41, section 821.123, which describes and provides guidance for reporting certain types of accidents.¹⁰
- a. Please confirm that the Total Accidents Rate performance indicator result will include all accidents reported under section 821.123 of ELM 41. If not confirmed, please explain which types of accidents will be included in the Total Accidents Rate performance indicator result and which types of accidents will be excluded.
 - b. Please specify whether accidents involving only property damage will be included in the Total Accidents Rate performance indicator result.

RESPONSE:

a. Not confirmed. ELM Section 821.123 provides that the following are reported as accidents in the Employee Health & Safety (EHS) accident reporting tool:

- *Injury or illness of a Postal Service employee*
- *Death of a Postal Service employee on Postal Service premises or on the job*
- *Injury or fatality to a non-Postal Service person on Postal Service premises*
- *Motor vehicle accident that results in death, injury, or property damage, regardless of cost, who was injured (if anyone), or what property was damaged*
- *Damage of \$500 or more to Postal Service property or to property of customers or the general public, regardless of whether an injury was involved*
- *Fire damage of \$100 or more to Postal Service property*

The following are excluded from the Total Accident Rate performance indicator:

¹⁰ See United States Postal Service, *ELM 41 - Employee and Labor Relations Manual* (September 2016) § 821.123 (available at: http://about.usps.com/manuals/elm/html/elmc8_010.htm) (ELM 41).

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- Injury or fatality to a non-Postal Service person
- Damage of \$500 or more to customer property without injury
- Fire damage of \$100 or more without injury

All other items will be included in the calculation.

b. Property damage to Postal Service property will be included in the Total Accident Rate performance indicator results.

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5. The Postal Service states that its “communication and training campaigns addressed the most frequent hazards of the workplace, such as dog bites, extreme heat, distracted driving, proper lifting and reaching....” FY 2016 *Annual Report* at 20. A review of the causes of each OSHA recordable accident provided by the Postal Service shows that many of these injuries were due to falls.¹¹ Please discuss the FY 2016 communication and training campaigns that addressed the causes of falls, as well as the FY 2017 plans and schedules for reducing the number of injuries or accidents due to falls.

RESPONSE:

The FY 2016 Safety Communication contained posters, videos, and stand-up talks related to slips, trips, and falls throughout the year. Each communication method was tailored to the specific time of year and most likely cause of slips, trips, and falls. As an example, there were messages focused on winter walking, fall leaves, and distracted walking. In FY 2017, the Safety Communication will continue to focus on slips, trips, and falls. Weekly reminders will be sent to each carrier through Mobile Delivery Devices. Additionally:

- a new video on plant safety, with a focus on walking around powered industrial trucks, will be filmed and released;
- additional footwear tread options will be explored for winter weather walking; and
- communications through the Operations Vice Presidents will focus on preventing slips, trips, and falls.

¹¹ See March 1, 2017 Response to CHIR No. 19, question 10; *id.* Excel file “ChIR.19.Q.10.OSHA by Cause.xlsx.”

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7. Please confirm that the Postal Service continues to use competitive products as performance indicators for the Deliver High-Quality Service performance goal.¹³
- a. If confirmed, please provide FY 2016 results and FY 2017 targets for each competitive products performance indicator.
 - b. If the Postal Service did not meet a FY 2016 target for a competitive products performance indicator, please explain why and describe the FY 2017 plans and schedules to meet the FY 2017 target. See 39 U.S.C. § 2804(d)(3).

RESPONSE:

Please see the response filed under seal as an attachment to the Preface of USPS-FY16-NP42.

¹³ See Docket No. ACR2015, Analysis of the Postal Service's FY 2015 Annual Performance Report and FY 2016 Performance Plan, May 4, 2016, at 22 n.35.